

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: MAYRA E RODRIGUEZ LEON DEBTOR(S)	CASE NO.: 13-00365-BKT CHAPTER-13-
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MOTION FOR POST CONFIRMATION MODIFICATION OF
CHAPTER 13 PAYMENT PLAN

TO THE HONORABLE COURT:

COMES NOW DEBTOR(S), through the undersigned attorney and to this Honorable Court respectfully states and prays as follows:

1. Debtor(s) filed a voluntary petition (chapter 13) which payment plan was confirmed.
2. Debtor(s) is/are hereby requesting to be allowed to modify her confirmed payment plan to provide for direct payments to Banco Santander (POC 6).

WHEREFORE it is respectfully requested to this Honorable Court that the request for post confirmation modification of confirmed payment plan be accepted.

NOTICE IS HEREBY GIVEN TO PARTIES IN INTEREST THAT THEY HAVE TWENTY ONE (21) DAYS TO OBJECT THE PROPOSED MODIFICATION OF THE CHAPTER 13 PLAN AND REQUEST A HEARING. ABSENT GOOD CAUSE UNTIMELY OBJECTIONS SHALL BE DENIED.

CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion has been filed with the Clerk of the court using the CM/ECF system that will electronically notify parties in interest and to Chapter 13, Trustee Alejandro Oliveras, US. Trustee Office. Non CM/ECF participants that are interested parties will be notified by regular US Postal Service.

In Cayey, Puerto Rico, this December 16th, 2014.

/s/Miriam A. Murphy Lightbourn
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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: MAYRA E RODRIGUEZ LEON

CASE NO. 13-00365-BKT

CHAPTER 13

DEBTOR(S)

CHAPTER 13 PAYMENT PLAN

NOTICE: • The following plan contains provisions which may significantly affect your rights. When confirmed, the plan will bind the debtor and each creditor to its terms. Objections must be filed in writing, filed with the Court and served upon the debtor(s), debtors' counsel, the trustee and any other entity designated by the Court, at the 341 meeting of creditors or not less than twenty (20) days prior to the scheduled confirmation hearing. • For post confirmation Plan Modifications, objections must be filed and notified in the same manner within forty (40) days from its notification. • A proof of claim must be filed by or on behalf of each creditor, including secured creditors, in order for the creditor to be eligible to be paid by the trustee. The Trustee will pay the allowed claims, as filed, provided for in the plan unless disallowed or expressly modified by the terms of this plan, or by subsequent Court order. If no claim is filed the trustee will not pay a creditor provided in the plan unless ordered by the Court. See the notice of commencement of case for 341 meeting date and claims bar date, the latter is the date by which a proof of claim must be filed in order to participate of the plan distribution. •

1. Future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee. The Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULED.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE SEQUENCE.
- ☐ 3. The Confirmation Order will not vest property of the Estate on Debtor(s) until the Order discharging Debtor(s) is entered.

PLAN DATED: December 16, 2014

☐ AMENDED PLAN DATED:☐ PRE ☒ POST-CONFIRMATIONFILED BY ☐ DEBTOR ☐ TRUSTEE ☐ UNSECURED CREDITOR

I. PAYMENT PLAN SCHEDULE

\$	100	x	23	=	2,300
\$	300	x	37	=	11,100
\$		x		=	0
\$		x		=	0
\$		x		=	0
\$		x		=	0
TOTAL =					60 \$ 13,400

Additional Payments:

\$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from

☐ Sale of property identified as follows:☐ Other:

Periodic Payments to be made other than and in addition to the above.

\$ _____ x _____ = \$ 0

To be made:

PLAN BASE: \$ 13,400

II. ATTORNEY'S FEES

(Treated as § 507 Priorities)

- I. To be paid before any other creditor and concurrently with the Trustee's fee unless otherwise provided.

- a. Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,706
- b. Additional Fees: \$
- c. Adjusted Balance \$ 2,706

Signed: Mayra E Rodriguez Leon
DEBTOR MAYRA E RODRIGUEZ LEON

JOINT DEBTOR

III. DISBURSEMENT SCHEDULE SEQUENCE

A. SECURED CLAIMS:

☐ Debtor represents that there are no secured claims.☒ Creditors having secured claims will retain their liens and shall be paid as follows:**1** ADEQUATE PROTECTION PAYMENT CR _____ \$ _____**2** Trustee pays secured ARREARS:

Cr. BANCO SANTANDER Cr. _____ Cr. _____
Acct. POC 6 Acct. _____ Acct. _____
\$ 616.42 \$ _____ \$ _____

3 Trustee pays IN FULL Secured Claim(s):

Cr. _____ Cr. _____ Cr. _____
Acct. _____ Acct. _____ Acct. _____

4 Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
Acct. _____ Acct. _____ Acct. _____
\$ _____ \$ _____ \$ _____

☐ Secured creditor(s) interest will be insured and insurance policy pay through plan:

Cr.: _____ Ins.Co.: _____ Premium: \$ _____
Cr.: _____ Ins.Co.: _____ Premium: \$ _____

(Please indicate in "Other Provisions" the comprised insurance coverage period.)

☐ Debtor SURRENDERS COLLATERAL TO Lien Holder:☒ Debtor Otherwise will maintain regular payments directly to:
BANCO SANTANDER

B. PRIORITIES. The Trustee shall pay priorities in accordance with the law.

5 [11 U.S.C. § 507 and § 1322 (a)(2)]C. UNSECURED PREFERRED: Plan ☐ Classifies ☐ Does not Classify Claims.**6** Class **A**: ☐ Co-debtor Claims ☐ Paid 100% ☐ "Pay Ahead":**7** Class **B**: ☐ Other Class:

☐ Cr. _____ ☐ Cr. _____ ☐ Cr. _____
Acct. _____ Acct. _____ Acct. _____
\$ _____ \$ _____ \$ _____

D. GEN. UNSECURED NOT PREFERRED will receive PRO-RATA disbursements. ☐

OTHER PROVISIONS:

LV: \$235.00 ***Any post petition income tax refund that the debtor(s) would be entitled to receive during the term of the plan will be used to fund this plan. After its confirmation, and without further notice, hearing or Court order, the plan shall be deemed modified by increment(s) to its base, in an amount equal to the amount of each income tax refund. Debtor surrenders shares to AEELA.